

EMS Audit Plan

Audit Plan No.	Audit Date(s) May 19, 2003	
A. Audit objectives and scope Initial audit of EPA Region III's EMS. This audit is limited in scope because of (1) the facility being in the early stage of implementing an EMS; and (2) time – one day audit.		
B. Audit Criteria EPA EMS audit and management review & ISO 14001.		
C. Organization/functional units to be audited EMS team representatives and work group members, senior management, and individual employees.		
D. Contact person	Department/Location	Responsibility
C. Carr	HSCD	Team member/Work group
Y. Hamilton	ORC	Team member/Work group
J. Alper	OPM	Team member/Work group
G. Volk	OPM-Facilities	Work group
J. Pike	WCMD	Team member/Work group
G. Fala	Computer Services	Work group
C. Petrow	WPD	
J. Burke	EAID	EMS Coordinator
S. Donohue	EAID	EMS Webmaster/Work group
J. Cassidy	WCMD	
E. High priority elements All core elements.		
F. Audit procedure(s)		Title
EPA EMS Audit Program and Management Review (manual)		Revision
Use of personal knowledge and ISO auditor training of lead audit team.		April 2003
G. Communication of observations/ findings during the audit May 19-23, 2003 Within audit team. May 27, 2003 EMS Coordinator June 2-6, 2003 (tent.) Senior Management Meeting		
H. Reference documents		Revision
Website		As of May 13, 2003
Policy		
Aspects & Impacts		

Targets & Objectives	
Manual	May 13, 2003
I. Time/duration of audit	
May 19-23, 2003	
J. Date	Location(s)
May 19, 2003	EPA Region III 1650 Arch Street Philadelphia, PA 19103
L. Audit Team Members	
Howard Heim, Marie Holman, Denise Rigney	
M. Pre-audit conference schedule	N. Daily briefings schedule
May 13, 2003	May 20, 2003
O. Post- audit conference schedule	P. Audit report schedule
May 21, 2003 1:00 - 4:00 p.m. (Verbal) May 27, 2003 (Written)	May 27, 2003
Q. Confidentiality requirements: None	
R. Reporting and distribution requirements	
TBD	
Prepared by:	Reviewed and approved by:
Howard Heim, Marie Holman, Denise Rigney	

EMS Audit Findings Summary Table

Facility Name: U. S. Environmental Protection Agency, Region III

Team Leader: Howard Heim

Date: May 29, 2003

EPA Question-naire No.	Finding No.	Category/ Rating	Finding/ISO Std. No.	Details of Finding (Who, What, When, How)
1	1	Acceptable	EMS regional policy statement developed and signed by top management. 4.2	Policy included all necessary components of the ISO 14001 standard and EPA's requirement.
11	2	Acceptable	Website developed and useful. 4.4.3	Website is easy to navigate and contains all the elements of an EMS (and very informative).
11	3	Acceptable	EMS information and results publicly available. 4.4.3	EMS information, including team contacts, policy statement, aspects and impacts, and objectives and targets, is available to the public on the web.
8	4	Acceptable	General awareness training and interactive web training conducted and useful. 4.4.2	Training offered for all employees; interactive format helped with understanding of an EMS.
5	5	Acceptable	Energy savings ideas by Information Services team show good potential. 4.3.4	"Power down" concepts should be recognized and implemented.
EPA Question-naire No.	Finding No.	Category/ Rating	Finding/ISO Std. No.	Details of Finding (Who, What, When, How)
1, 7, 8	6	Critical-Major Conditional	EMS perceived as environmental improvement program only. 4.2/4.4.1/4.4.2	Interviewees well versed in environmental benefits of program but not the emphasis on management systems.
3	7	Critical Unacceptable	Legal review focus on environmental improvement goals vs. Regional compliance 4.3.2	Based on interviews, team practice did not contain EMS accountability or measures to ensure Region III compliance with environmental, health and safety laws and regulations, EOs, and other applicable requirements.

7	8	Critical Conditional	Team meeting attendance improvements needed. 4.4.1	Schedule conflicts caused some key members to miss meetings; back-up is needed.
1, 11	9	Critical Conditional	Continuing evidence of top management commitment needed. 4.2/4.4.3	Several interviewees felt demonstration of commitment by management is needed beyond signed policy to ensure EMS becomes permanent.
4, 7, 11	10	Critical Unacceptable	EMS not yet part of operations. 4.2/4.4.1	Divisions are not making EMS framework a routine part of operations. This may result in parts of the EMS's core elements being overlooked. EMS divisional team assignments and work groups need to ensure that the EMS core elements are addressed. For example, the environmental, health, and safety (EHS) compliance assessment process is described in the Region III's EMS manual (2.B. Procedure for Identifying Legal and Other Requirements), however, the EHS manager is not a member of the EMS team. The Region must ensure (1) that the EHS compliance assessment is integrated within the EMS framework, and (2) the ESH compliance assessments must address the EMS core elements.
1, 4, 5, 7	11	Critical Conditional	EMS perceived as an add on program (another transitory project), established programs take precedent. 4.2/4.3.4/4.4.1/4.4.3	Deadlines and established program commitments force lower priority for time spent on EMS.
1, 11	12	Major Conditional	Employees not aware of EMS policy. 4.2/4.4.3	EMS team members and management aware of policy, other employees not always aware of policy.
4, 6, 10	13	Major Conditional	Performance tracking tools needed. 4.4.6/4.5.1	Indicators of progress, such as energy use, miles per gallon, paper consumption still need to be established (Audit team is aware that EMS team and work groups are currently working in this area.)
8	14	Major Conditional	EMS team training needs improvement. 4.4.2	EMS training video entitled, "Awareness Training, EMS, Preparing for ISO EMS Implementation," was not as useful as EPA's EMS Implementation Course and video/CD.
	15	Major Conditional	Employee Awareness Training effectiveness improvements needed. 4.4.2	Student recall of training content was not always clear. Comprehension tests would be helpful. Also, audit team suggests refresher training to be scheduled on a regular basis (yearly).
1	16	Major Conditional	Budget constraints delay EMS improvement ideas.	Purchase of software to track printing and paper use, etc. not currently being pursued due to budget constraints.

			4.2	
3	17	Major Conditional	Extension of EMS to contractors, suppliers, etc. needed. 4.3.1	Contract language, bidding practices needed to accommodate EMS in the future.
1, 11	18	Major Conditional	Authority needed to emphasize EMS expectations. 4.2/4.4.3	Level of management direction determines degree of participation. EMS advocacy is needed.
4	19	Major Conditional	Interested parties not identified or pro-actively included. 4.3.3/4.4.3	Interviewees stated that outside interested parties were not identified or included when developing aspects/impacts or targets and objectives.

EMS Auditor(s):

EMS Audit Summary Report

Facility Name: U.S. Environmental Protection Agency Region III

Date: May 29, 2003

Finding 1 EMS regional policy statement developed and signed by top management. (4.2 Policy)
1. What is your rating for this activity?
- Acceptable: X
- Conditional, after corrective actions:
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. Policy includes necessary components of the ISO 14001 standard and EPA's EMS requirement.
B. Policy statement signed by senior managers.
C.
D.
E.
F.
3. In which areas or criteria do you find this activity weak?
A. Policy statement is not readily displayed in public areas, conference rooms, lobby, or employee common areas.
B.
C.
D.
E.
F.
4. Comments on environmental management policies and procedures reviewed during this audit:
5. Comments on management quality and information organization:

Signature of EMS Auditor(s):

EMS Audit Summary Report

Facility Name: U.S. Environmental Protection Agency Region III

Date: May 29, 2003

Finding 2 Website developed and useful. (4.4.3 Communication)
1. What is your rating for this activity?
- Acceptable: X
- Conditional, after corrective actions:
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. Website is easy to navigate and contains the elements of the Region III EMS.
B. Information is available to the public for review.
C.
D.
E.
F.
3. In which areas or criteria do you find this activity weak?
A.
B.
C.
D.
E.
F.
4. Comments on environmental management policies and procedures reviewed during this audit:
5. Comments on management quality and information organization:

Signature of EMS Auditor(s):

EMS Audit Summary Report

Facility Name: U.S. Environmental Protection Agency Region III

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Finding 3 EMS Information and results publicly available. (4.4.3 Communication)
1. What is your rating for this activity?
- Acceptable: X
- Conditional, after corrective actions:
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. EMS information including team contacts, policy statement, aspects and impacts, and objectives and targets are available to the public on the web for comment.
B.
C.
D.
E.
F.
3. In which areas or criteria do you find this activity weak?
A.
B.
C.
D.
E.
F.
4. Comments on environmental management policies and procedures reviewed during this audit:
5. Comments on management quality and information organization:

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EMS Audit Summary Report

Facility Name: U.S. Environmental Protection Agency Region III

Date: May 29, 2003

Finding 4 General Awareness Training and interactive web training conducted and useful. (4.4.2 Training, Awareness & Competence)
1. What is your rating for this activity?
- Acceptable: X
- Conditional, after corrective actions:
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. Training conducted for all employees.
B. Interactive format helped with understanding of general concepts of an EMS.
C. Graphics provided clear information on status of Region III effort.
D. Internet training provided opportunity to capture employees unable to attend classroom sessions.
E.
F.
3. In which areas or criteria do you find this activity weak?
A.
B.
C.
D.
E.
F.
4. Comments on environmental management policies and procedures reviewed during this audit:
5. Comments on management quality and information organization:

Signature of EMS Auditor(s):

EMS Audit Summary Report

Facility Name: U.S. Environmental Protection Agency Region III **Date:** May 29, 2003

Finding 5 Energy savings ideas by Information Services team show good potential. (4.3.4 Environmental Management Program(s))
1. What is your rating for this activity?
- Acceptable: X
- Conditional, after corrective actions:
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. Information Services has already set most of the regional computers to sleep mode to conserve energy use (only old computers with Windows 95 operating systems do not go to sleep).
B. Other proactive ideas include measurement and monitoring software to track use of printers and paper use.
C. Modification of computer system to limit the amount of energy using hardware at each desk is another consideration.
D.
E.
3. In which areas or criteria do you find this activity weak?
A. Two "B" above, has not been implemented due to budget constraints.
B.
C.
D.
E.
4. Comments on environmental management policies and procedures reviewed during this audit:
5. Comments on management quality and information organization:

Signature of EMS Auditor(s):

EMS Audit Summary Report

Facility Name: U.S. Environmental Protection Agency Region III **Date:** May 29, 2003

Finding 6 EMS perceived as environmental improvement program only. (4.2/4.4.1/4.4.2 Policy/Structure & Responsibility/Training, Awareness and Competence)
1. What is your rating for this activity?
- Acceptable:
- Conditional, after corrective actions: Improve training. Provide training update on management core elements. Management system concepts need to be part of training and organizational structure.
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. Pollution Prevention stressed well.
B. Team members understood specific aspects and impacts.
C. Environmental improvement list very comprehensive.
E.
3. In which areas or criteria do you find this activity weak?
A. Initial training needs more emphasis on management systems.
B. Lack of management emphasis on management principles of EMS subsequent to training.
C.
4. Comments on environmental management policies and procedures reviewed during this audit:
1. Region III's EMS policy statement, manual, and website were all very useful. 2. EPA's questionnaire and audit forms were useful; however, the form templates needed to be edited extensively to prepare the electronic audit report.
5. Comments on management quality and information organization:
1. Information was well organized, when available. 2. Availability of senior management needs to be incorporated into the scheduling of the EMS audit.

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EMS Audit Summary Report

Facility Name: U.S. Environmental Protection Agency Region III **Date:** May 29, 2003

Finding 7 Legal review focus on environmental improvement goals vs. regional compliance (4.3.2 Legal and other requirements).
1. What is your rating for this activity?
- Acceptable:
- Conditional, after corrective actions:
- Unacceptable: Higher risk of consequences of non-compliance.
2. In which areas or criteria do you find this activity strong?
A. Importance and understanding of Executive Orders.
B. EMS manual appears to provide appropriate procedure.
C.
3. In which areas or criteria do you find this activity weak?
A. Based on interviews, team practice did not contain EMS accountability or measures to ensure Region III compliance with environmental, health and safety laws, regulations, Executive Orders, etc.
B. Safety, Health & Environmental Manager is not part of the EMS team.
C. Training may have missed these issues resulting in a misunderstanding.
D. As yet, no routine environmental, health and safety audit procedures consistent with EMS procedure shown or in place (manual).
E. Frequency of HQ environmental audit appears to be too long (5 years).
F.
4. Comments on environmental management policies and procedures reviewed during this audit:
Region III EMS manual clarified appropriate procedure on identification of legal and other requirements.
No EMS audit procedure for conducting environmental, health and safety audits shown or in place at this time.
5. Comments on management quality and information organization:
Separate procedures for conducting environmental, health and safety audits needed. Should be referenced as part of the EMS manual.

Signature of EMS Auditor(s):

EMS Audit Summary Report

Facility Name: U.S. Environmental Protection Agency Region III

Date: May 29, 2003

Finding 8 Team meeting attendance improvements needed. (4.4.1 Structure & Responsibility)
1. What is your rating for this activity?
- Acceptable:
- Conditional, after corrective actions: Meetings should be mandatory; appoint backup, if needed.
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. Team membership has been established and published.
B.
C.
D.
E.
3. In which areas or criteria do you find this activity weak?
A. No central record of EMS team meetings held, including minutes and attendance records.
B. Meetings do not have all divisions represented.
C. No accountability for missed meetings.
D.
E.
4. Comments on environmental management policies and procedures reviewed during this audit:
A full calendar of meeting dates should be established.
5. Comments on management quality and information organization:
Assemble a record containing the meeting minutes, action items, etc.

Signature of EMS Auditor(s):

EMS Audit Summary Report

Facility Name: U.S. Environmental Protection Agency Region III

Date: May 29, 2003

Finding 9 Continuing evidence of top management commitment needed. 4.4.2 Policy/4.4.3 Communication
1. What is your rating for this activity?
- Acceptable:
- Conditional, after corrective actions: Additional demonstration of management support is needed.
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. Policy completed and signed by senior managers.
B. EMS team aware of senior management commitment.
C. EMS policy statement posted on web.
D.
3. In which areas or criteria do you find this activity weak?
A. Lack of visibility of policy statement; employees are not sure of senior management commitment.
B. EMS policy not prominently posted in common spaces – lobby, conference rooms, divisional offices, etc.
C.
D.
4. Comments on environmental management policies and procedures reviewed during this audit:
Policy statement included a commitment to continual improvement and to comply with legal and other requirements; provided a framework for setting and reviewing objectives and targets; and communicated to employees. Policy is available to the public via the web. Policy statement was comprehensive and included the core elements.
5. Comments on management quality and information organization:
Policy readily available on web; however, the policy statement needs to be displayed prominently through out the office space (or by other creative communication tools–LAN pop-ups, Regional Administrator messages, etc).

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Finding 10 EMS not yet part of operations. (4.2 Policy/4.4.1 Structure & Responsibility)
1. What is your rating for this activity?
- Acceptable:
- Conditional, after corrective actions:
- Unacceptable: Make EMS part of routine operations. Divisional framework should address core elements of EMS.
2. In which areas or criteria do you find this activity strong?
A. EMS process appears to be complete and documented on the web, etc.
B. Most divisions are represented on the EMS team; see 3.E. below.
C.
D.
3. In which areas or criteria do you find this activity weak?
A. EMS does not appear to be a standard agenda topic at divisional, and lower level staff meetings.
B. At this time, divisions are not making EMS framework a routine part of operations.
C. Aside from divisional EMS team representative, divisions do not appear to have a structure in place or responsibilities identified for EMS implementation.
D. Division representation alone may not stress focus on discussing all aspects of core elements.
E. EHS manager is not a member of the EMS team.
F.
4. Comments on environmental management policies and procedures reviewed during this audit:
<p>EMS team contact list (website) is good since it shows name, phone numbers, etc.</p>
5. Comments on management quality and information organization:
<p>The EMS core elements need to be incorporated when developing divisional structure/responsibilities for implementing the region's EMS. Also, the Region must ensure (1) that the EHS compliance assessment is integrated within the EMS framework, and (2) the ESH compliance assessments must address the EMS core elements.</p> <p>The EMS team and workgroups may need to ensure that the EMS core elements were addressed in developing the regional EMS and workplans.</p>

Signature of EMS Auditor(s):

EMS Audit Summary Report

Facility Name: U.S. Environmental Protection Agency Region III

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Finding 11 EMS perceived as an “add on” program, established programs take precedent. (4.2 Policy/4.3.4. Env. Mgt. Prog./4.4.1. Structure & Responsibility/4.4.3. Communication)
1. What is your rating for this activity?
- Acceptable:
- Conditional, after corrective actions: Senior management should communicate their EMS expectations to employees, including a commitment to maintain the program.
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. Motivation by team members is good.
B.
C.
3. In which areas or criteria do you find this activity weak?
A. Perception by some employees that this may be another “green” program only with no additional resources to implement activities.
B. EMS activities sometimes not given the same priority as established program activities.
C. It does not appear that employees believe that EMS will affect them and their daily activities.
D.
4. Comments on environmental management policies and procedures reviewed during this audit:
5. Comments on management quality and information organization:

Signature of EMS Auditor(s):

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Finding 12 Employees not aware of EMS policy. (4.2 Policy, 4.4.3 Communication)
1. What is your rating for this activity?
- Acceptable:
- Conditional, after corrective actions: Increase awareness of policy by raising profile of signed policy by displaying in lobby, hallways, and other common areas.
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. EMS policy clearly available on the internet.
B. EMS employee awareness training held; also, an EMS training module is available on the Region III's intranet.
C.
D.
3. In which areas or criteria do you find this activity weak?
A. EMS policy not displayed in common areas, lobby, divisional offices, or conference rooms.
B. No demonstration of personal commitment (signature) to EMS was required.
C. No accountability for lack of awareness of EMS policy exists. (E.g., Employee Performance Standards.
D. No reinforcement for continued awareness of EMS policy by employees exists. (E.g., Employee recognition/award.)
E. Completed training records not available
F.
4. Comments on environmental management policies and procedures reviewed during this audit:
Training records are not yet available.
5. Comments on management quality and information organization:
Suggest employees sign or confirm they understood training through testing, etc.

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Finding 13 Performance tracking tools needed. (4.4.6 Operational Control/4.5.1 Monitoring and Measurement)
1. What is your rating for this activity?
- Acceptable:
- Conditional, after corrective actions: Develop tracking tools including baseline information.
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. Information services group has some data that the EMS team and workgroups may find useful.
B.
C.
3. In which areas or criteria do you find this activity weak?
A. Baseline data for regional usage of electricity, water and gasoline usage not currently available.
B. Baseline data on individual printer and paper usage not utilized.
C.
4. Comments on environmental management policies and procedures reviewed during this audit:
Expectation of tracking performance is clearly stated in the EMS manual.
5. Comments on management quality and information organization:

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Facility Name: U.S. Environmental Protection Agency Region III

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Finding 14 EMS team training needs improvement. (4.4.2 Training Awareness and Competence)
1. What is your rating for this activity?
- Acceptable:
- Conditional, after corrective actions: Improve scope and extent of EMS Team Training.
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. EMS team members able to identify training gaps.
B. Team members found EPA's EMS Implementation Training Course, Modules 1 - 4, effective and understandable.
C.
3. In which areas or criteria do you find this activity weak?
A. Interviewees collectively agreed that the "Awareness Training EMS – Preparing for ISO EMS Implementation," was too long and not easily understood.
B. Based on interviews, team members who viewed only the initial training video but missed the implementation training video modules 1-4 do not fully understand the management principles of EMS.
C.
4. Comments on environmental management policies and procedures reviewed during this audit:
Training tools need to be available, critiqued, and updated periodically.
5. Comments on management quality and information organization:
Initial training not shown to audit team. No independent critique by EMS audit team conducted.

Signature of EMS Auditor(s):

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Facility Name: U.S. Environmental Protection Agency Region III

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Finding 15 Employee Awareness Training effectiveness improvements needed. (Training Awareness and Competence 4.4.2)
1. What is your rating for this activity?
- Acceptable:
- Conditional, after corrective actions: Require certification of understanding of training conducted.
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. Overall awareness training presented was interesting to the students.
B. Power Point presentation was effective in communicating EMS concepts.
C.
3. In which areas or criteria do you find this activity weak?
A. Training lack employee accountability for understanding EMS concepts.
B.
C.
4. Comments on environmental management policies and procedures reviewed during this audit:
5. Comments on management quality and information organization:

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EMS Audit Summary Report

Facility Name: U.S. Environmental Protection Agency Region III

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Finding 16 Budget Constraints Delay Implementation of EMS Improvement Ideas. (4.4.1 Structure and Responsibility)
1. What is your rating for this activity?
- Acceptable:
- Conditional, after corrective actions: Management should provide resources necessary to implement and control of the EMS (resources include human resources, specialized skills, technology, and financial resources). (Pg 3 ISO 14001:1996(E))
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. Information services has detailed information on types and cost of software for monitoring and control tools.
B.
3. In which areas or criteria do you find this activity weak?
A. EMS team should synchronize planning so the budget needs are consistent with federal fiscal cycle.
B. No fiscal process reviewed by EMS team.
C.
4. Comments on environmental management policies and procedures reviewed during this audit:
Team agenda should include fiscal discussion and plan.
5. Comments on management quality and information organization:

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Facility Name: U.S. Environmental Protection Agency Region III

Date: May 29, 2003

Finding 17 Extension of EMS to contractors and suppliers, etc. needed. (4.3.1 Environmental Aspects)
1. What is your rating for this activity?
- Acceptable:
- Conditional, after corrective actions: Team members should break out contract potential for their division or area.)
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. Potential for expanding EMS many outside parties.
B. Lead by example.
C.
D.
E.
F.
3. In which areas or criteria do you find this activity weak?
A. Contractors and suppliers not yet considered in EMS planning.
B.
C.
D.
E.
F.
4. Comments on environmental management policies and procedures reviewed during this audit:
5. Comments on management quality and information organization:

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Finding 18 Authority needed to emphasize expectations. (4.2 Policy/4.4.3 Communication0
1. What is your rating for this activity?
- Acceptable:
- Conditional, after corrective actions: Program advocate may be needed to champion all EMS implementation steps.
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. EMS manual and website well laid out.
B.
3. In which areas or criteria do you find this activity weak?
A. Need stronger management authority or advocacy to sustain EMS and to negotiate improvements.
B.
C.
4. Comments on environmental management policies and procedures reviewed during this audit:
EMS manual and website are comprehensive.
5. Comments on management quality and information organization:
More authority to enable some concept to be carried out which would otherwise be difficult.

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Finding 19 Interested parties not identified or pro-actively included in the EMS. (4.3.3, 4.4.3)
1. What is your rating for this activity?
- Acceptable:
- Conditional, after corrective actions: Identify interested parties and need more active involvement.
- Unacceptable:
2. In which areas or criteria do you find this activity strong?
A. EMS manual includes procedure for identifying interested parties and responding to them.
B. EMS information and results publicly available on the EMS website.
C.
D.
E.
F.
3. In which areas or criteria do you find this activity weak?
A. Procedure for identifying interested parties not followed by workgroup members.
B. No proactive efforts to obtain views of outside interested parties.
C. Target and objective development procedure does not include consideration of the views of interested parties.
D.
E.
F.
4. Comments on environmental management policies and procedures reviewed during this audit:
<p>EMS manual provided information on the proper procedure for communicating with interested parties. However, interested parties were neither identified nor listed, or their views considered.</p>
5. Comments on management quality and information organization:

Signature of EMS Auditor(s):_